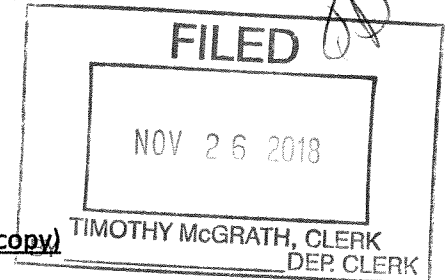


ALLEN WINDRIM, Pro Se
Debtor

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

Bankruptcy No. 18-16016JKF
Chapter 13



ANSWER TO TRUSTEE'S MOTION TO DISMISS (2nd copy)

AND NOW, comes Debtor, Allen Windrim, and files the within Answer's and allege as follows:

1. Debtor, Allen Windrim, has found out today, 26th November 2018 that the court has not received a copy of my answer, only after calling to confirm the hearing scheduled for the 28th November 2018 was still scheduled. (Attached you will find proof of mailing back on November 16, 2018).
2. Debtor, Allen Windrim, filed a Motion with the Court of Common Pleas, Philadelphia County, on the 24th October 2018, to stop the sheriff sale listed for the auction on November, 6th, 2018; the court scheduled a hearing for the same date, and one half an hour before the meeting of the creditors.
3. Debtor, Allen Windrim, emailed the trustee's office by sending an email to:
ecfemail@FredReigleCh13.com and received a rejection email.
4. Debtor, Allen Windrim, faxed the same to the trustee's office and received a confirmation that the fax was successfully sent.
5. Debtor, Allen Windrim, did send a copy of the request to change/postpone/continue the meeting of the creditors for another date and time in the near future as seen appropriate by the trustee.
6. Debtor, Allen Windrim, did fail to follow-up with the trustee's office after the fax was sent and letter was sent, not at all deliberate or intentional; merely a mistake, but is taking ownership of the mistake.
7. Debtor, Allen Windrim, did speak to the trustee's office on November 5th, 2018 and was told to fax a letter to the trustee's office; and the letter was completed and faxed on November, 6th, 2018.
8. Debtor, Allen Windrim, received a copy of the Motion filed before this honorable court and immediately called and left a message for Polly Langdon, at the telephone number provided in the Motion received.

9. Debtor, Allen Windrim, received a call back from Barbara, a staff member of the trustee's office and was informed that their office was not in receipt of my faxed letter from November 6th, 2018.
10. Debtor, Allen Windrim, received instruction from Barbara, a staff member of the trustee's office to send another email and Debtor, was also provided instructions that it would be the Debtor's sole responsibility to notify all creditors of the new meeting of the creditors date and time.
11. Debtor, Allen Windrim, sent the email as instruction to ecfemail@FredReigleCh13.com and received another rejection email, as previous; and secondary email to Info@ReadingCh13.com and has not received a reply as of the date of the mailing of this Motion response.
12. Debtor, Allen Windrim, will submit, at the time of the hearing, all related documents, fax confirmation pages, email rejection's, etc., all related to the Motion in question; only at the hearing, because Debtor is not skilled, knowledgeable or prepared to ask or submit documents, under seal, because of private, non-public information contained within these documents.

WHEREFORE, Debtor, Allen Windrim, respectfully requests that this Honorable Court enter an Order in response to the Debtor's Motion for:

(1) A new hearing date and time for the meeting of the creditors;

- and -

(2) Not dismissing Debtor's current case;

- and -

(3) Denying Trustee's Motion To Dismiss Pursuant to 11 U.S.C. Section 1307

Respectfully Submitted:

/s/: Allen Windrim
Allen Windrim, Pro Se,
Debtor

Dated: 16th November 2018

Dated: 26th November 2018 (2nd copy)

ALLEN WINDRIM, Pro Se	:	UNITED STATES BANKRUPTCY COURT
Debtor	:	EASTERN DISTRICT OF PENNSYLVANIA
	:	
	:	
	:	Bankruptcy No. 18-16016JKF
	:	Chapter 13

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct 2nd copy of the foregoing Answer To Trustee's Motion To Dismiss, were served on this 26th day of November, 2018, by hand delivery to the Courthouse and fax copy to the attorney for the trustee, upon those listed below:

(HAND DELIVERED 2ND COPY)

U.S. Bankruptcy Court

Clerk's Office

United States Courthouse

900 Market Street

Philadelphia, PA 19107

&

(FAXED 2ND COPY TO: 610-779-3637 &

EMAILED 2ND COPY TO: Info@ReadingCh13.com)

Polly Langdon, Esq.

for William Miller, Esq.

Interim Chapter 13 Trustee

2901 St. Lawrence Avenue, Suite 100

Reading, PA 19606

/s/: Allen Windrim
Allen Windrim, Pro Se,
Debtor

Dated: 26th November 2018


U.S. POSTAL SERVICE	CERTIFICATE OF MAILING
MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL, DOES NOT PROVIDE FOR INSURANCE-POSTMASTER	
Received From: <u>Allen Windrim</u> <u>2244 S. 9th St.</u> <u>Phila PA 19148</u>	
One piece of ordinary mail addressed to: <u>US Bankruptcy Court - Clerks Office</u> <u>US Courthouse</u> <u>900 Market St.</u> <u>Phila. PA 19107</u>	

PS Form 3817, January 2001

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U.S. POSTAL SERVICE	CERTIFICATE OF MAILING
MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL, DOES NOT PROVIDE FOR INSURANCE-POSTMASTER	
Received From: <u>Allen Windrim</u> <u>2244 S. 9th St.</u> <u>Phila PA 19148</u>	
One piece of ordinary mail addressed to: <u>Polly Langdon, Esq.</u> <u>Interim Chap 13 Trustee</u> <u>2901 St. Lawrence Ave. #102</u> <u>Reading, PA 19606</u>	

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